

**WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

**THERESA D. THOMAS, et al.,**  
*Plaintiffs*

**UNITED STATES OF AMERICA,**  
*Plaintiff-Intervenor*

**vs.**

**ST. MARTIN PARISH SCHOOL  
BOARD, et al.,**  
*Defendants*

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**CIVIL ACTION NO. 6:65-cv-11314**

**JUDGE ELIZABETH E. FOOTE**

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**JOINT MOTION FOR APPROVAL AND ENTRY OF REVISED CONSENT ORDER  
REGARDING ST. MARTINVILLE ZONE MAGNET AND  
DISTRICT-WIDE TRANSFER PROGRAMS**

**COME NOW**, through undersigned counsel, Plaintiffs, Plaintiff-Intervenor United States of America, and Defendant St. Martin Parish School Board (hereinafter “Parties”) and respectfully move this Court to approve and enter the revised Consent Order Regarding St. Martinville Zone Magnet and District-Wide Transfer Programs (“Consent Order”), revised on June 9, 2023, which is submitted with this Joint Motion as the proposed order. In support of this request, the Parties would show that, since its original submission on May 12, 2023, the Parties and the Court have had three status conferences to discuss revising the Consent Order’s language and the Parties have discussed various proposed revisions.

On June 7, 2023, the Parties and the Court held two such status conferences to discuss revised language of the proposed Consent Order, including language the School Board and Plaintiffs negotiated, and the Court’s suggested revisions to same. That same day, the School Board voted to approve settlement of the revised terms.

Accordingly, the Parties have reached agreement as to the revised terms set forth in the proposed Consent Order. In addition to the revised language, the Parties have agreed with the Court's suggestion to sever Sections II(J) and II(K) so they may be issued in a separate order.<sup>1</sup> The Parties would submit that the terms of the proposed Consent Order address the Court's prior order regarding the magnet program and student transfers, and that such terms are consistent with the Fourteenth Amendment to the United States Constitution and other applicable federal law, and that such entry will further the orderly desegregation of the District.

**THEREFORE, PREMISES CONSIDERED**, the Parties respectfully request the Court to approve and enter the revised proposed Consent Order Regarding St. Martinville Zone Magnet and District-Wide Transfer Programs.

**RESPECTFULLY SUBMITTED**, this the 9<sup>th</sup> day of June 2023.

**For Plaintiffs:**

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<sup>1</sup> Minute Entry, R. Doc. 679 at 2.

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